

# Katten

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March 26, 2024

**VIA ECF & FEDEX**

Chief Judge Margo K. Brodie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: State Farm Mut. v. Metro Pain Specialists, P.C., et al.,  
Case No. 1:21-cv-05523-MKB-PK (E.D.N.Y.) – Courtesy Copies**

Dear Chief Judge Brodie:

Pursuant to Your Honor's Individual Practice Rules Section 3(D), Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company (collectively, "Plaintiffs") hereby submit courtesy copies of the following motion papers:

1. Plaintiffs' Notice of Motion to Dismiss Defendants' Counterclaims, dated February 5, 2024 (Dkt. 523).
2. Plaintiffs' Memorandum of Law in Support of Motion to Dismiss Defendants' Counterclaims, dated February 5, 2024 (Dkt. 524).
3. Declaration of Jonathan Marks in Support of Plaintiffs' Motion to Dismiss Defendants' Counterclaims, dated March 26, 2024 (Dkt. 525).
  - a. Exhibit A to the Declaration of Jonathan Marks, subject to a motion to seal (Dkt. 525-1).
  - b. Exhibit B to the Declaration of Jonathan Marks (Dkt. 525-2).
  - c. Exhibit C to the Declaration of Jonathan Marks (Dkt. 525-3).
4. Declaration of Steven J. Harfenist in Opposition to Plaintiffs' Motion to Dismiss Defendants' Counterclaims, dated March 15, 2024 (Dkt. 527).
  - a. Exhibit A to the Declaration of Steven J. Harfenist (Dkt. 527-1).

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- b. Exhibit B to the Declaration of Steven J. Harfenist (Dkt. 527-2).
- c. Exhibit C to the Declaration of Steven J. Harfenist (Dkt. 527-3).
- 5. Metro Pain Specialists P.C., Tri-Borough NY Medical Practice P.C. and Leonid Shapiro, M.D.'s Memorandum of Law in Opposition to Plaintiffs' Motion to Dismiss Defendants' Counterclaims, dated March 15, 2024 (Dkt. 527-4).
- 6. Plaintiffs' Reply in Support of Their Motion to Dismiss Defendants' Counterclaims, dated March 26, 2024 (Dkt. 529).

Sincerely,

/s/ Jonathan L. Marks

Jonathan L. Marks

cc: Magistrate Judge Peggy Kuo (via FedEx)  
Steven Harfenist (via email to [sharfennist@hkplaw.com](mailto:sharfennist@hkplaw.com))  
Neil Torczyner (via email to [ntorczyner@hkplaw.com](mailto:ntorczyner@hkplaw.com))